Case 4:23-00-00034826-KIF-0SE24LEDOCLDOCOM11enF20-Filed 100/18/23 IND/XXXOOnP100/01/23 Page 1 of 6 D

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Case No.

23 CR 318 GKF

Plaintiff.

FILED UNDER SEAL

V.

INDICTMENT

[COUNT ONE: 18 U.S.C. § 1201(a)(1) – Kidnapping;

COUNT TWO: 18 U.S.C. § 1951 -

Obstructing, Delaying, and

Affecting Commerce by Robbery;

COUNT THREE: 18 U.S.C.

§§ 924(c)(1)(A)(ii) – Carrying,

Using, and Brandishing a Firearm During and in Relation to a Crime

During and in Relation to a Cri

of Violence;

Forfeiture Allegation: 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –

Firearms Forfeiture

a/k/a "Isyss,"

TASHONNA LEIGH ANDERSON.

Defendants.

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 1201(a)(1)]

On or about August 17, 2021, in the Northern District of Oklahoma, the defendants

TASHONNA LEIGH ANDERSON,

a/k/a "Isyss," and others known and unknown to the Grand Jury, knowingly and unlawfully seized, confined, inveigled, decoyed, kidnapped, abducted, and held for ransom and reward, and otherwise, persons known to the Grand Jury, and used the mail and any means, facility, and instrumentality of interstate and foreign commerce in committing and in furtherance of the commission of the

offense.

All in violation of Title 18, United States Code, Section 1201(a)(1).

COUNT TWO [18 U.S.C. § 1951]

On or about August 17, 2021, in the Northern District of Oklahoma, the defendants

TASHONNA LEIGH ANDERSON,

a/k/a "Isyss," conspired with each other, and with others known and unknown to the Grand Jury, to unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in such commerce by robbery.

All in violation of Title 18, United States Code, Section 1951.

<u>COUNT THREE</u> [18 U.S.C. §§ 924(c)(1)(A)(ii)]

On or about August 17, 2021, in the Northern District of Oklahoma, the defendants,

TASHONNA LEIGH ANDERSON,

a/k/a "Isyss," and others known and unknown to the Grand Jury, knowingly carried, used, and brandished a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is,

Obstructing, Delaying, and Affecting Commerce by Robbery, as set forth more fully in Count Two of this Indictment.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii).

FORFEITURE ALLEGATION [18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c)]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in this Indictment, as a part of his sentence, the defendants

shall forfeit to the United

States any firearm and ammunition involved in or used in the knowing commission of such offenses. The property to be forfeited includes, but is not limited to:

FIREARM(S) AND AMMUNITION

- 1. A Pioneer Arms Corp, Model Hellpup, 7.62 caliber pistol, serial number PAC1154986;
- 2. A Masterpiece Arms, 9mm caliber pistol caliber pistol, serial number B25A2;
- 3. A Smith and Wesson, Model SD9VE, 9mm caliber pistol, serial number FCB7631;
- 4. A Diamondback, Model DB15, .223 caliber rifle, serial number DB2011344; and
- 5. Assorted rounds of ammunition.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

CLINTON J. JOHNSON United States Attorney

A TRUE BILL

KENNETH ELMORE

Assistant United States Attorney

<u>/s/Grand Jury Foreperson</u>
Grand Jury Foreperson